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FILED
DISTRICT COURT OF GUAM

SEP 23 2005 *MP*

MARY L.M. MORAN
CLERK OF COURT

Attorneys for the United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KAREN CHAE,
YU MI CHUNG, and
PETER PARK,

Defendants.

CRIMINAL CASE NO. 03-00059

**MOTION OF PARTIES FOR
DESTRUCTION OF EVIDENCE**

The parties in the above-entitled matter hereby moves this Honorable Court for an entry of an order permitting the Immigration and Customs Enforcement to destroy articles seized from the possession of the defendant in this prosecution and bearing counterfeit marks as itemized in Attachment A. This stipulation is made pursuant to 18 U.S.C. § 2320(b), which provides that upon a determination by a preponderance of the evidence that an article in the possession of the defendant bears counterfeit marks, the United States may obtain an order for the destruction of such articles. The parties hereby motion that the articles seized by Immigration and Customs

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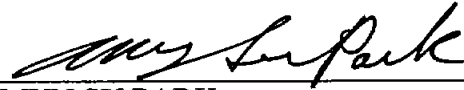
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1 Enforcement as shown in Attachment A under this case number are counterfeit and thereby
2 subject to destruction.

3 09/21/05
4 DATE

6 9/21/05
7 DATE


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MUN SU PARK
Attorney for Defendant Karen Chae

8 
JOHN GORMAN
Attorney for Defendant Yu Mi Chung

9 LEONARDO M. RAPADAS
10 United States Attorney
11 Districts of Guam and NMI

12 9/20/05
13 DATE

14 By:

15 
16 KAREN V. JOHNSON
17 Assistant U.S. Attorney
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ATTACHMENT A

A.	12 Louis Vuitton bags	A.	30 Hunting World bags
B.	20 Louis Vuitton bags	B.	75 small Prada bags
C.	12 Louis Vuitton bags	C.	40 assorted Prada bags
D.	14 Louis Vuitton bags	D.	12 assorted Prada bags
E.	6 Louis Vuitton bags	E.	25 Chanel bags
F.	30 Louis Vuitton bags	F.	5 Chanel bags
G.	15 Chanel bags	G.	30 Louis Vuitton bags
H.	30 Louis Vuitton wallets	H.	12 Louis Vuitton bags
I.	20 Louis Vuitton wallets	I.	94 assorted Louis Vuitton flat goods
J.	15 Prada wallets	J.	23 Louis Vuitton straps
K.	25 Rolex watches	K.	15 assorted Chanel flat goods
L.	45 Prada emblems	L.	7 Cartier wallets
M.	20 Chanel shirts	M.	22 Dunhill wallets
N.	11 Gucci bags	N.	4 Hunting World wallets
O.	102 Louis Vuitton key straps	O.	8 assorted Prada flat goods
P.	54 Gucci key straps	P.	37 assorted Chanel jewelry
		Q.	7 Chanel belts
		R.	2 Gucci sunglasses
		S.	3 Chanel sunglasses
		T.	11 Cartier watches
		U.	30 Rolex watches
		V.	45 Chanel earrings
		W.	9 Bvlgari watches
		X.	48 Chanel clothing, assorted styles
		Y.	10 Fendi clothing
		Z.	6 Giorgio Armani jackets
		AA.	3 assorted Gucci clothing
		BB.	9 Gucci watches
		CC.	6 Cartier flat goods
		DD.	7 Chanel bags
		EE.	8 Louis Vuitton
		FF.	24 assorted tie clips
		GG.	12 Chanel emblems
		HH.	18 Prada cards
		II.	23 Prada labels
		JJ.	49 Chanel cards
		KK.	6 Louis Vuitton locks
		LL.	26 assorted representative samples